

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,  
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,  
CHRISTOPHER HUGHES, and FACEBOOK,  
INC.,

Defendants.

CIVIL ACTION NO. 1:04-cv-11923  
(DPW)

District Judge Douglas P.  
Woodlock

Magistrate Judge Robert B.  
Collings

MARK ZUCKERBERG and  
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**[PROPOSED] ORDER**

For the reasons fully set forth in Plaintiff's Motion to Compel Facebook Defendants' Production of Documents in Response to Request for Production Nos. 171, 174-182, and 184-187, and accompanying memorandum, Facebook Defendants are hereby ordered to produce documents responsive to Plaintiff's Production Request Nos. 171, 174-182, and 184-187, and/or amend their responses, no later than \_\_\_\_\_, 2006, as set forth below:

1. Produce documents responsive to Production Request Nos. 171, 174-175, 178-180, 182, 186, 187;
2. Produce documents responsive to Production Request Nos. 176-177, or amend their responses to state that they have no responsive documents;
3. Produce documents responsive to Production Request No. 181, or amend their response to state that they do not have any such code and that no preexisting code was incorporated into the facebook.com code;
4. Produce documents responsive to Production Request No. 184, or produce documents sufficient to identify the crashed hard drive, the date and circumstances surrounding the alleged malfunction of the facemash hard drive and loss of the facemash code, the date and circumstances surrounding the alleged loss of the hard drive (if they now claim it was lost), the location and custodian of all other memory devices that contain a copy of the facemash code, all backup copies or copies stored on other memory devices, and explain why this hard drive cannot be produced;
5. Produce documents responsive to Production Request No. 185, or amend their response to explain if this is the same hard drive as the drive mentioned in response to Request No. 30, to provide details relating to the alleged loss of this hard drive, including the circumstances, date of loss, make and model of the lost hard drive, the location and custodian of all other memory devices that contain a copy of thefacebook.com programs, and to produce all backup copies or copies stored on other memory devices.

**SO ORDERED**

DATED: \_\_\_\_\_

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District Judge Douglas P. Woodlock  
Magistrate Judge Robert B. Collings